

Tel: [212] 965-9081 Fax: [212] 965-9084 99 Hudson Street, 8th Floor New York, New York 10013 nsbcivilrights.com

October 10, 2014

Via ECF

Honorable Kenneth M. Karas United States District Judge Southern District of New York United States Courthouse 300 Quarropas Street, Chambers 533 White Plains, NY 10601

RE: Deskovic v. City of Peekskill, et al., 07-CV-8150 (KMK)

Dear Judge Karas,

Plaintiff has attempted to address the Court's concerns regarding the *New York Times* clips by limiting the proposed use of the audio and video to the following:

- 1. selected photographs of Mr. Deskovic, without any audio;
- 2. two audio clips, without any video; and
- 3. a combined audio and video clip of a public appearance by Mr. Deskovic.

As discussed with your honor's law clerk, Plaintiff will electronically submit these selections to the Court today and will also provide the Court with a CD at our next appearance. Defendants have reviewed these requests and maintain their opposition.

Respectfully submitted,

Farhang Heeshiri

Farhang Heydari

CC: all counsel (by ECF)